

1 JASON M. FRIERSON
2 United States Attorney
3 Nevada Bar Number 7709
4 NADIA AHMED
5 Assistant United States Attorney
6 Nevada Bar Number 15489
7 501 Las Vegas Blvd. South, Ste. 1100
8 Las Vegas, Nevada 89101
9 Phone: (702) 388-6336
10 Email: nadia.ahmed2@usdoj.gov
11 *Attorneys for the United States of America*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 vs.
17 CHRISTOPHER BUSBY,
18 Defendant.

Case No. 2:15-cr-00353-GMN-NJK

**Stipulation and Order to Extend Deadline
to Respond to Defendant's Motion for
Compassionate Release (ECF No. 214)
and Supplement in Support Thereof (ECF
No. 227)
(First Request)**

19
20 IT IS HEREBY STIPULATED AND AGREED, by and between undersigned
21 counsel for the United States of America, and Jacqueline Tirinnanzi, that the deadline for
22 the government to file its Response to Defendant's Motion for Compassionate Release
23 (ECF No. 214) and Supplement to Mr. Busby's Motion for Compassionate Relief (ECF
24 No. 227), currently due May 3, 2024, be extended seven days to May 10, 2024.

25 This stipulation is entered into based upon the following reasons:

26 1. Counsel for Defendant was appointed to Mr. Busby to supplement his
27
28

1 motion for compassionate release on February 27, 2024. (ECF No. 220).

2 2. This Court issued an order requiring that counsel must either file a
3 supplement to the motion for compassionate release (or file a notice that no supplement is
4 needed) on or before April 5, 2024. (ECF No. 224.) On April 12, 2024, Defendant's
5 Supplement to Mr. Busby's Motion for Compassionate Release was filed. (ECF No. 227.)
6

7 3. The government requests an additional seven days to complete its review and
8 response to Defendant's Motion and Supplement. This request is made for the following
9 reasons, including undersigned counsel's recent travel related to religious observances
10 between April 9-15 and April 24-28. Additionally, counsel for the government did not brief
11 or litigate any of Defendant's prior Motions, including his lengthy 2255 motion or the prior
12 two compassionate release motions, and counsel requests the additional time to further
13 understand the procedural history of the case. Additionally, counsel for the government is
14 currently set to appear for oral argument before the Ninth Circuit on May 13, 2024, in
15 *United States v. Gail Manney*, Case No. 23-00716 and set to proceed to trial in *United States v.*
16 *Pacheco*, 2:19-cr-248-RFB-DJA on May 20, 2024, and has been preparing for both matters,
17 accordingly.
18

19
20 4. This request is not made for purposes of delay but rather based upon good
21 cause.
22

23 5. The parties stipulate and request that the Court allow the government to file
24 its response to the Supplement and Motion by no later than May 10, 2024. Defendant shall
25 have seven days thereafter to file his Reply.

26 6. The parties agree to the extension of time.
27
28 ///

1 7. This is the first request for extension of time for the government's Response.

2
3 Dated this 2nd day of May 2024.

4
5 Respectfully Submitted,

6
7 JASON FRIERSON
8 United States Attorney

9 /s/ Nadia Ahmed
10 NADIA AHMED
11 Assistant United States Attorney

12 /s/ Jacqueline Tirinnanzi
13 JACQUELINE TIRINNANZI, ESQ
14 Counsel for Christopher Busby

1
2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 UNITED STATES OF AMERICA,
5

6 Plaintiff,

7 vs.

8 CHRISTOPHER BUSBY,
9

10 Defendant.

Case No. 2:15-cr-00353-GMN-NJK

Order

11
12 Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY
13 ORDERED that the government's response to Defendant's Motion for Compassionate
14 Release (ECF No. 214) and Supplement to Mr. Busby's Motion for Compassionate Release
15 (ECF No. 227) shall be due by May 10, 2024, and Defendant's counsel will have seven
16 days following submission of the response to file a reply.
17

18
19 DATED: May 2, 2024
20

21
22 
23 THE HONORABLE GLORIA M. NAVARRO
24 UNITED STATES DISTRICT JUDGE
25
26
27
28